

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**URGENT MOTION FOR LEAVE TO FILE EXCESS PAGES  
IN SUPPORT OF OMNIBUS REPLY OF THE COMMONWEALTH  
OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM  
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO  
RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY  
TO OBJECTIONS TO THE DISCLOSURE STATEMENT MOTION**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA”), pursuant to section 315(b) of the *Puerto Rico*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Oversight, Management, and Economic Stability Act (“PROMESA”)*<sup>2</sup> (the Oversight Board, in its capacity as representative of the Commonwealth, ERS, and PBA, is referred to as the “Debtors”), respectfully submits this urgent motion (the “Urgent Motion”), for leave to file the omnibus reply (the “Omnibus Reply”) to the objections interposed to the *Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures* [ECF No. 16756] (the “Disclosure Statement Motion”) in excess of the page limit set forth in Paragraph I.E. of the *Fifteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 17127-1] (the “Case Management Procedures”).

### **Jurisdiction and Venue**

1. The United States District Court for the District of Puerto Rico (the “Court”) has subject matter jurisdiction over this matter pursuant to PROMESA § 306(a).

2. Venue is proper pursuant to PROMESA § 307(a).

### **Background**

3. On May 4, 2021, the Court entered the *Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III)*

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

*Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* (the “Disclosure Statement Hearing Scheduling Order”) [ECF No. 16681]. The Disclosure Statement Hearing Scheduling Order set the Disclosure Statement Hearing for July 13, 2021 at 9:30 a.m., Atlantic Standard time.

4. On May 11, 2021, the Debtors filed:

- (a) the *Third Amended Title III Joint Plan Of Adjustment Of The Commonwealth Of Puerto Rico, et al.* [ECF No. 16740] (as may be amended or modified, the “Plan”), and
- (b) the *Disclosure Statement for the Third Amended Title III Joint Plan Of Adjustment Of The Commonwealth Of Puerto Rico, et al.* [ECF No. 16741] (as may be amended or modified, the “Disclosure Statement”).

5. On May 13, 2021, the Debtors filed:

- (a) the Disclosure Statement Motion requesting entry of an order (the “Disclosure Statement Order”) approving the Disclosure Statement and establishing, among other things, solicitation and voting procedures in connection with the Plan, and
- (b) the *Motion of Debtors for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [ECF No. 16757] (the “Confirmation Discovery Procedures Motion”).

6. Pursuant to the DS Hearing Scheduling Order, the deadline to file an objection to the Disclosure Statement was on June 15, 2021. To date, the following objections were interposed (collectively, the “Objections”):<sup>3</sup>

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
17011	6/15/21	<i>The Puerto Rico Fiscal Agency and Financial Advisory Authority’s Limited Objection to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the</i>	AAFAF

<sup>3</sup> The categories, organization, and summary of the responses below are solely for convenience and not intended, and should not be construed or deemed, to be a waiver of any of the Oversight Board’s arguments, defenses, or other rights.

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
		<i>Commonwealth of Puerto Rico, et al. (the “AAFAF Objection”)</i>	
<b>Official Committees</b>			
17003	6/15/21	<i>Limited Response of the Official Committee of Retired Employees to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures (the “Retiree Committee Objection”)</i>	Official Committee of Retired Employees (the “ <u>Retiree Committee</u> ”)
17017	6/15/21	<i>Omnibus Objection of Official Committee of Unsecured Creditors to (I) Disclosure Statement for Third Amended Title III Joint Plan of Adjustment of Commonwealth of Puerto Rico et al. and (II) Related Motions (the “UCC Objection”)</i>	Official Committee of Unsecured Creditors (the “ <u>UCC</u> ”)
<b>DRA Parties</b>			
17006	6/15/21	<i>Objection of the DRA Parties to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII)</i>	AmeriNational Community Services, LLc, as servicer for the GDB Debt Recovery Authority; and Cantor-Katz Collateral Monitor LLC (collectively, the “ <u>DRA Parties</u> ”)

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
		<i>Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures (the “<u>DRA Objection</u>”)</i>	
<b><i>Monolines</i></b>			
16998	6/15/21	<i>Objection of Ambac Assurance Corporation and Financial Guaranty Insurance Company to the Board’s Disclosure Statement Approval Motion and Confirmation Procedures Motion (the “<u>Ambac/FGIC Objection</u>”)</i>	Ambac Assurance Corporation (“ <u>Ambac</u> ”), and Financial Guaranty Insurance Company (“ <u>FGIC</u> ”)
17008	6/15/21	<i>Objection of Ambac Assurance Corporation to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. (the “<u>Ambac Objection</u>”)</i>	Ambac
17007	6/15/21	<i>Objection of Financial Guaranty Insurance Company to Approval of Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. (the “<u>FGIC Objection</u>”)</i>	FGIC
17164	6/25/21	<i>Supplemental Objection of Ambac Assurance Corporation to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, Et Al. (the “<u>Ambac Supplemental Objection</u>”)</i>	Ambac
<b><i>U.S. Bank</i></b>			
16975	6/15/21	<i>Limited Objection of U.S. Bank National Association as PREPA Bond Trustee to Approval of Debtors’ Amended Disclosure Statement</i>	U.S. Bank National Association, as PREPA Bond Trustee
16981	6/15/21	<i>Objection of U.S. Bank as Successor Trustee for the PRIFA Rum Tax Bonds to Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and</i>	U.S. Bank, as successor trustee for PRIFA Rum Tax Bonds

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
		<i>Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures</i>	
16983	6/15/21	<i>Objection of U.S. Bank as Fiscal Agent for the Puerto Rico Public Building Authority Bonds to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures</i>	U.S. Bank, as fiscal agent for PBA Bonds
16984	6/15/21	<i>Objection of U.S. Bank as Trustee for Bonds Issued by UPR, PRIDCO, Children's Trust, Municipal Finance Agency and AFICA (University Plaza and Ana G. Mendez) to Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation</i>	U.S. Bank, as trustee for bonds issued by UPR, PRIDCO, Children's Trust, Municipal Finance Agency, and AFICA (University Plaza and Ana G. Mendez)



<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
		<i>Deadlines, and (VIII) Approving Vote Tabulation Procedures</i>	
16989	6/15/21	<i>Objection of U.S. Bank as Trustee for the Puerto Rico Public Finance Corporation Bonds to the Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures</i>	U.S. Bank, as trustee for PFC Bonds
<b><i>Underwriters</i></b>			
16987	6/15/21	<i>Joint Objection of Underwriter Defendants to Debtors' Motion for an Order Approving Disclosure Statement</i>	Underwriter Defendants
16993	6/15/21	<i>Joinder of Merrill Lynch, Pierce, Fenner &amp; Smith Inc. in Support of Joint Objection of Underwriter Defendants to Debtors' Motion for an Order Approving Disclosure Statement</i>	Merrill Lynch, Pierce, Fenner & Smith Inc.
<b><i>Eminent Domain Claimants</i></b>			
16969	6/14/21	<i>Objection to "Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al." by Creditor PFZ Properties, Inc. (the "PFZ Objection")</i>	PFZ Properties, Inc. ("PFZ")
17005	6/15/21	<i>Joinder of Creditor Demetrio Amador Inc./Demetrio Amador Roberts to Creditor PFZ Properties, Inc.'s Objection to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.</i>	Demetrio Amador Inc. / Demetrio Amador Roberts

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
17016	6/15/21	<i>Maruz Real Estate Corp. 's Motion for Joinder to Creditor PFZ Properties, Inc. 's Objection to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al. filed at Docket No. 16969</i>	Maruz Real Estate Corp.
16996	6/15/21	<i>Objection to: "Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al." (the "<u>Finca Objection</u>")</i>	Finca Matilde, Inc. (" <u>Finca</u> ")
<b>Health Centers</b>			
16980	6/15/21	<i>Objection to Disclosure Statement (the "<u>SIM Objection</u>")</i>	Salud Integral de la Montaña, Inc. (" <u>SIM</u> ")
16988	6/15/21	<i>Limited Objection and Reservation of Rights of Certain Medical Centers to Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. (the "<u>AMC Objection</u>")</i>	Atlantic Medical Center, Inc., et al. (the " <u>AMC Group</u> ")
<b>Dairy Producers</b>			
16986	6/15/21	<i>Objection of Vaqueria Tres Monjitas, Inc. to Disclosure Statement (the "<u>VTM Objection</u>")</i>	Vaqueria Tres Monjitas, Inc. (" <u>VTM</u> ")
17013	6/15/21	<i>Objection to Disclosure Statement and or the Plan of Adjustment at Dkt. No. 16740 &amp; 16741 (the "<u>Suiza Objection</u>")</i>	Suiza Dairy Corp. (" <u>Suiza</u> ")
<b>Misc. Groups</b>			
17001	6/15/21	<i>Limited Objection of the Ad Hoc Group of FGIC Noteholders to the (I) Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al., and (II) Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Taconic Capital Advisors LP, Aurelius Capital Management, LP, Canyon Capital Advisors LLC, First Ballantyne LLC, and Moore Capital Management, LP (collectively, the " <u>Ad Hoc Group of FGIC Noteholders</u> ")



<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
17002	6/15/21	<i>Statement and Reservation of Rights Regarding Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Altair Global Credit Opportunities Fund (A), LLC, et al.
16978	6/15/21	<i>Objection to “Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.” by Creditors Who Are Plaintiffs in Certain Cases Under 42 U.S.C. §1983</i>	Group of Section 1983 Plaintiffs
17021	6/15/21	<i>Objection to the Third Oversight Board’s Plan of Adjustment and Disclosure Statement Dated May 11, 2021 and Requesting for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 3013 to Reclassify Together Employees Wage Claims Included in Class 55, with Class 49 AFSCME Employees Claims or in the Alternative, Be Placed in a Separate Class, to Provide Group Wage Claim Holders Equal Treatment as that Provided to AFSCME Employees Grivance [sic] and Colective [sic] Bargaining [sic] Pre-Petition Wage Awards and Requesting Related Reliefs (the “Group Wage 3013 Motion”)</i>	Group of active and former government employees (the “ <u>Group Wage Objectors</u> ”)
17055	6/16/21	<i>Asociación Puertorriqueña de la Judicatura’s Objection to Disclosure Statement (the “<u>APJ Objection</u>”)</i>	Asociación Puertorriqueña de la Judicatura (“ <u>APJ</u> ”)
<b><i>Pro Se</i></b>			
16908	6/09/21	<i>Response and Objection of Individual Bondholder to Debtors’ Application for Approval of Disclosure Statement</i>	Peter C. Hein, <i>pro se</i>
16909	6/09/21	<i>[1] Response and Objection of Individual Bondholder to Debtors’ Motions for Orders Establishing Confirmation Procedures, and [2] Cross-Motion to Establish a Committee to Represent Retail Investors in the Confirmation Process</i>	Peter C. Hein, <i>pro se</i>
16977	6/15/21	<i>Supplemental Response and Objection of Individual Bondholder to Debtors’ Belated Submission of Exhibit N to Disclosure Statement (Best Interests Test Reports)</i>	Peter C. Hein, <i>pro se</i>

<u>ECF No.</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Party</u>
16871	6/02/21	Objection of Martin Cervera Antonio	Martin Cervera Antonio, <i>pro se</i>
16872	6/02/21	Objection of Maria Teresita Martin	Teresita Martin, <i>pro se</i>
16937	6/10/21	Objection of Ana A. Núñez Velázquez	Ana A. Núñez Velázquez, <i>pro se</i>
17040	6/15/21	Supplemental Objection of Ana A. Núñez Velázquez	Ana A. Núñez Velázquez, <i>pro se</i>
16939	6/10/21	Objection of Wanda I. Ortiz Santiago	Wanda I. Ortiz Santiago, <i>pro se</i>
16955	6/11/21	<i>Objections from Retires [sic] Members</i>	Nancy I. Negrón-López, <i>pro se</i>
17047	6/15/21	<i>Motion to Opposition [sic] to the Restructuration Plan of the \$100 Billion Fiscal Debt Dismembering What is Left of Puerto Rico</i>	Yashei Rosario, <i>pro se</i>

### **Relief Requested**

7. Paragraph I.E. of the Case Management Procedures limits memoranda of law in support of replies to fifteen (15) pages. Case Management Procedures ¶ I.E.

8. In order to adequately summarize and address the various issues raised by the Objections, the Oversight Board was unable to meet the 15-page limit for replies set forth in the Case Management Procedures. Accordingly, the Oversight Board respectfully requests leave to file the Omnibus Reply with a length not to exceed sixty (60) pages, exclusive of the cover page, the table of contents, the table of authorities, the signature page, and exhibits. To the extent necessary, the Oversight Board also respectfully requests leave to include an exhibit of approximately sixty (60) pages providing an explanatory chart summarizing the Objections and the Oversight Board's replies with respect thereto on a topic-by-topic basis to assist the Court in its review of the myriad Objections.

9. In accordance with Paragraph I.H of the Case Management Procedures, the Oversight Board informed the objecting parties of its intent to seek leave to file a request for excess pages.

10. Pursuant to Paragraph I.H of the Case Management Procedures, the undersigned counsel hereby certify that they have (a) carefully examined the matter and concluded that there is a true need for an urgent decision; (b) not created the urgency through any lack of due diligence; and (c) made reasonable, good-faith communications in an effort to resolve or narrow the issues before the Court.

11. The Oversight Board hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

12. No prior request for the relief sought in this Urgent Motion has been made to this or any other court.

*[Remainder of page intentionally left blank]*

WHEREFORE the Oversight Board respectfully requests the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the Debtor the relief requested herein and all other relief as is just and proper.

Dated: June 25, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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/s/ Hermann D. Bauer

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Debtors*

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO, AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY,

Debtors.<sup>4</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER APPROVING  
URGENT MOTION FOR LEAVE TO FILE EXCESS PAGES  
IN SUPPORT OF OMNIBUS REPLY OF THE COMMONWEALTH  
OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM  
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO  
RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY  
TO OBJECTIONS TO THE DISCLOSURE STATEMENT MOTION**

Upon the *Urgent Motion for Leave to File Excess Pages in Support of Omnibus Reply of the Commonwealth of Puerto Rico, the Employee Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Buildings Authority to Objections to the*

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<sup>4</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).



*Disclosure Statement Motion* (the “Urgent Motion”);<sup>5</sup> and the Court having found it has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA; and it appearing that venue in this district is proper pursuant to section 307(a) of PROMESA; and the Court having found that the Oversight Board provided adequate and appropriate notice of the Urgent Motion under the circumstances and that no other or further notice is required; and upon the record herein, after due deliberation thereon, the Court having found that good and sufficient cause exists for the granting of the relief as set forth herein,

IT IS HEREBY ORDERED THAT:

1. The Urgent Motion is GRANTED as set forth herein.
2. The Oversight Board may file the Memorandum, with a length not to exceed sixty (60) pages, exclusive of the cover page, the table of contents, the table of authorities, the signature page, and exhibits.
3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: June \_\_\_\_, 2021

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT COURT JUDGE

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<sup>5</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Urgent Motion.